



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

**Note to Reader**

**Background:** As part of its effort to involve the public in the implementation of the Food Quality Protection Act of 1996 (FQPA), which is designed to ensure that the United States continues to have the safest and most abundant food supply.

EPA is undertaking an effort to open public dockets on the organophosphate pesticides. These dockets will make available to all interested parties documents that were developed as part of the U.S. Environmental Protection Agency's process for making reregistration eligibility decisions and tolerance reassessments consistent with FQPA. The dockets include preliminary health assessments and, where available, ecological risk assessments conducted by EPA, rebuttals or corrections to the risk assessments submitted by chemical registrants, and the Agency's response to the registrants' submissions.

The analyses contained in this docket are preliminary in nature and represent the information available to EPA at the time they were prepared. Additional information may have been submitted to EPA which has not yet been incorporated into these analyses, and registrants or others may be developing relevant information. It's common and appropriate that new information and analyses will be used to revise and refine the evaluations contained in these dockets to make them more comprehensive and realistic. The Agency cautions against premature conclusions based on these preliminary assessments and against any use of information contained in these documents out of their full context. Throughout this process, If unacceptable risks are identified, EPA will act to reduce or eliminate the risks.

There is a 60 day comment period in which the public and all interested parties are invited to submit comments on the information in this docket. Comments should directly relate to this organophosphate and to the information and issues available in the information docket. Once the comment period closes, EPA will review all comments and revise the risk assessments, as necessary.

These preliminary risk assessments represent an early stage in the process by which EPA is evaluating the regulatory requirements applicable to existing pesticides. Through this opportunity for notice and comment, the Agency hopes to advance the openness and scientific soundness underpinning its decisions. This process is designed to assure that America continues to enjoy the safest and most abundant food supply. Through implementation of EPA's tolerance reassessment program under the Food Quality Protection Act, the food supply will become even safer. Leading health experts recommend that all people eat a wide variety of foods, including at least five servings of fruits and vegetables a day.

**Note:** This sheet is provided to help the reader understand how refined and developed the pesticide file is as of the date prepared, what if any changes have occurred recently, and what new information, if any, is expected to be included in the analysis before decisions are made. **It is not meant to be a summary of all current information regarding the chemical.** Rather, the sheet provides some context to better understand the substantive material in the docket ( RED chapters, registrant rebuttals, Agency responses to rebuttals, etc.) for this pesticide.

Further, in some cases, differences may be noted between the RED chapters and the Agency's comprehensive reports on the hazard identification information and safety factors for all organophosphates. In these cases, information in the comprehensive reports is the most current and will, barring the submission of more data that the Agency finds useful, be used in the risk assessments.

A handwritten signature in black ink, appearing to read 'J. Housenger', is written over the typed name and title.

Jack E. Housenger, Acting Director  
Special Review and Reregistration Division

January 27, 1999

**MEMORANDUM**

**SUBJECT: REVISED EXPOSURES TO DDVP RESULTING FROM THE USE OF  
BAIT PRODUCTS (PC Code 084001, Barcode D251336)**

**FROM:** David Jaquith  
Chemistry and Exposure Branch 2  
Health Effects Division (7509C)

**TO:** Jess Rowland  
Risk Characterization and Analysis Branch/RRAB3  
Health Effects Division (7509C)

**THRU:** Sue Hummel, Branch Senior Scientist  
Chemistry and Exposure Branch 2  
Health Effects Division (7509C)

In April 1998 HED produced a document estimating the exposures of individuals using bait products containing DDVP (1). Bait products are usually applied directly as granules or dissolved in water to produce a syrup which is either sprayed or painted on surfaces. They may also be applied in the form of bait stations in which the material is applied to absorbent material and placed at locations throughout the facility. The products are used in agricultural or other commercial applications for fly control in the outdoor environment or in indoor cattle or battery poultry facilities.

HED has no data directly measuring the exposures of individuals applying dry bait products containing DDVP and therefore used data from the Pesticide Handler Exposure Database (PHED V1.1) which contained a single study (Number 520) that addresses that hand application of granular products. Examination of the Summary Statistics table indicated that virtually all of the measurements for these calculations found no detectable pesticide. While the level of detection for DDVP is different from that of the surrogate chemical it was judged that any attempt to calculate an exposure number based on almost all non detected samples would be completely artifactual and based only on the relative detection limits. Application of these granular products, while wearing protective gloves, was judged to result in negligible exposure. **HED noted that the labels do not specify protective gloves during application. This requirement should be added to the label and the above assumption is not valid**

**unless this label change is made.**

HED also reconsidered the potential exposures from the application of liquid bait formulations. Upon further evaluation and consultation with OPP experts, it was concluded that there were no suitable data with which to calculate a reliable exposure assessment for liquid bait products and that, given the more directed and localized application procedures for such products, the exposures would not exceed those from application directly to animals or to animal facilities (2).

#### REFERENCES

- 1) Memorandum from D. Jaquith (CEB2) to C. Scheltema (RCAB) titled "Exposures to DDVP From The Use of Bait Products (PC Code 084001, Barcode 246128)" dated April 28, 1998.
- 2) Memorandum from D. Jaquith (CEB2) to C. Scheltema (RCAB) titled "Revised Exposures to Dichlorvos (DDVP) Resulting From Dairy Barn and Animal Spray Uses (PC Code 084001, Barcode 251330)" dated December 3, 1998. Currently undergoing internal HED Review.

cc: Dichlorvos file (084001)  
Correspondence file